

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Room 4007-So.
Ag. Stop 0275
P.O. Box 96456
Washington, DC 20090-6456

Date:

[Docket #TMD-94-00-2]

Dear Ms. Stommes:

Comment Topic Heading: General/Crops/Handling/National List. USDA Proposed 205.2(56), 205.22, 205.26

Recently a prominent agricultural biotechnology firm (Monsanto) publicly called on the USDA to delay the decision regarding whether or not genetic engineering is permissible in "organic." I urge you to determine here and now that genetic engineering is not acceptable for "Organic" agricultural production practices, and that it never will be.

The USDA requested public comment on this very question. From what I understand, you've received significant public response, almost all of it opposed to the idea of classifying genetically engineered organisms as "organic." It would not be appropriate to delay the decision on the inclusion of Genetic Engineering or genetically engineered organisms, particularly if this delay could be construed as a response to a particular corporate interest.

Organic has a strong, clear tradition of excluding genetically modified organisms. The NOSB's recommendations called for the strict exclusion of Genetic Engineering and Genetically Engineered Organisms (GEO's). GEO's have no place in organic agriculture, and they never will. Instead, they should be classified as Prohibited Synthetics on the National List

Most importantly, the regulations will remain unacceptable until the National Organic Standards Board is given sole authority to make such determinations. The OFPA of 1990 gave the NOSB the authority to control such decisions regarding the National List.

Comment Topic Heading: General/National List. USDA Proposed 205.20-205.28

The National Organic Standards Board should have permanent and sole authority to select its own successors. This is essential to maintain the independence and integrity of the NOSB from shifting political winds and to ensure that the NOSB remain comprised of the most knowledgeable experts from the Organic Industry.

Sincerely yours,

signature: __

name: _____

address: _____
